

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN SHAWN ROBERTSON,

Defendants.

F I L E D
SEP 07 2022
U.S. DISTRICT COURT
FLINT, MICHIGAN

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
18 U.S.C. § 922(a)(6)
(False Statement during purchase of a Firearm)

On or about November 13, 2021, in the Eastern District of Michigan, the defendant, Kevin Robertson, in connection with the acquisition of a firearm, a Glock, model 19, 9mm semi-automatic handgun, Serial Number: BCRB260, from Guns Galore, Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Guns Galore, Inc., which statement was intended and likely to deceive Guns Galore Inc., as to a fact material to the lawfulness of such sale of the said firearm to the

defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO
18 U.S.C. § 924(a)(1)(A)
(False Statement during purchase of a Firearm)

On or about November 13, 2021, in the Eastern District of Michigan, the defendant, Kevin Robertson, knowingly made a false statement and representation to Guns Galore Inc., an entity licensed under the provisions of Chapter 44 or Title 18, United States Code, with respect to information required by the provisions of Chapter 44 or Title 18, United States Code, to be kept in the records of Guns Galore, Inc., in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that he was the actual buyer/transferee of the firearm, whereas in truth and in fact, the defendant was purchasing the firearm for another individual who was not eligible to purchase a handgun from a licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT THREE
18 U.S.C. § 922(a)(1)(A)

(Engaging in the Business of Selling Firearms Without a License)

On or about November 13, 2021, and continuing until on or about May 11, 2022, in the Eastern District of Michigan, the defendant, Kevin Robertson, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 932(a), and 924(a)(1)(D).

Forfeiture Allegation

The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed. R. Crim. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or any property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable

thereto; and all property involved in, or property traceable to, any of the violations set forth in this indictment.

THIS IS A TRUE BILL.

Dated: September 7, 2022

s/GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/TIMOTHY M. TURKELSON
TIMOTHY M. TURKELSON (P53748)
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s/ANTHONY P. VANCE
ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed by AUSA and initialed.

United States District Court Eastern District of Mich	Criminal Case Cover Sheet	Case Number
NOTE: It is the responsibility	Case: 4:22-cr-20460 Judge: Kumar, Shalina D. MJ: Ivy, Curtis Filed: 09-07-2022 INDI USA v. Kevin Robertson (tt)	tely in all respects. F I L E D SEP 07 2022
Companion Case Information		Companion Case Number: U.S. DISTRICT COURT FLINT, MICHIGAN
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: TT

Case Title: USA v. KEVIN SHAW ROBERTSONCounty where offense occurred : GeneseeCheck One: Felony Misdemeanor Petty

 Indictment/ Information --- no prior complaint.
X Indictment/ Information --- based upon prior complaint [Case number: 22-mj-30323]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

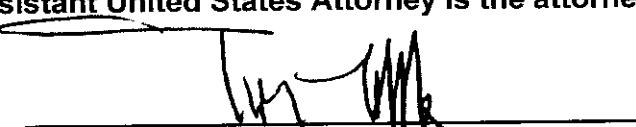
- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 7, 2022

Date


 Timothy Turkelson
 Assistant United States Attorney

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 Flint, Michigan 48502
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 P53748

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.